# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

In re:

BNP PETROLEUM CORPORATION § Case No. 09-20206

§

Debtor. § Chapter 11

# NOTICE OF WITHDRAWAL OF EXPEDITED MOTION FOR APPOINTMENT OF INTERIM TRUSTEE [Docket No. 36]

PLEASE TAKE NOTICE that Raptor Capital International, LLC ("Raptor"), a creditor the above-captioned Chapter 11 proceeding, files this Notice of Withdrawal of the Expedited Motion for Appointment of Interim Trustee [Docket No. 36].

- 1. On April 3, 2009, an involuntary petition under Chapter 7 of Title 11 of the United States Code was filed against BNP Petroleum Corporation (the "Debtor") by Baker Hughes Oilfield Operations, Inc., Schlumberger Technology Corporation and La Copa Field Services, Inc. (the "Petitioning Creditors").
- 2. On August 5, 2009, the Debtor consented to the entry of an order for relief under Chapter 7. Thereafter, the Debtor filed a motion to convert its case to a case under Chapter 11 of the Bankruptcy Code. The order converting the Debtor's case to Chapter 11 was entered on August 7, 2009.
- 3. On May 8, 2009, the Petitioning Creditors filed their Expedited Motion for Appointment of Interim Trustee (the "Motion"). Subsequent to the filing of the Motion, the Petitioning Creditors sold and assigned their claims to Raptor. Pursuant to this Court's June 26, 2009 Order Granting Joint Motion for Substitution of Parties, Raptor has been substituted as the petitioning creditor in the Debtor's bankruptcy case.

4. Raptor hereby withdraws the Motion without prejudice.

Respectfully submitted this 10th day of August 2009.

/s/ John F. Higgins

John F. Higgins State Bar No. 09597500 Joshua N. Eppich State Bar No. 24050567 PORTER & HEDGES, L.L.P. 1000 Main Street, 36<sup>th</sup> Floor Houston, Texas 77002 (713) 226-6000 (713) 226-6248 – Fax

ATTORNEYS FOR RAPTOR CAPITAL INTERNATIONAL, LLC

# **CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing document was served on the parties listed in the attached "Exhibit 1" by United States mail, postage prepaid on this the 10<sup>th</sup> day of August, 2009.

/s/John F. Higgins John F. Higgins

1656284v2 2

#### Exhibit "1"

#### **Debtor**

BNP Petroleum Corporation 500 N. Water Street, Suite 300 Corpus Christi, TX 78471

#### **Debtor's Attorney**

Marcy E. Kurtz Bracewell & Giuliani LLP South Tower Pennzoil Place 711 Louisiana, Suite 2300 Houston, TX 77002

# U.S. Trustee

United States Trustee 606 N. Carancahua Street, Suite 1107 Corpus Christi, TX 78476

# **Committee of Unsecured Creditors**

None appointed at this time.

## **Governmental Entities**

Susan Combs, Comptroller LBJ State Office Bldg. 111 E. 17<sup>th</sup> Street P.O. Box 13528 Austin, TX 78711

Securities Exchange Commission Attn: Merri Jo Gillette, Regional Director 175 W. Jackson Blvd., Suite 900 Chicago, IL 60604-2908

Internal Revenue Service P.O. Box 21126 Philadelphia, PA 19114

Internal Revenue Service 1919 Smith Street Stop 5022 HOU Houston, TX 77002

U.S. Department of Justice 950 Pennsylvania Ave., NW Washington, DC 20530-0001

U.S. Attorney's Office Southern District Donald J. Degabrielle, Jr. Judy A. Robbins P.O. Box 61129 Houston, TX 77208-1129

#### **Petitioning Creditors**

Baker Hughes Oilfield Operations, Inc. c/o Christopher J. Ryan P.O. Box 4740 Houston, TX 77210-4740

Schlumberger Technology Corporation Attn: James M. Sczudlo 1325 S. Dairy Ashford Houston, TX 77077

La Copa Field Services, Inc. 500 W. Fulton Sinton, TX 78387

### **Attorneys for Petitioning Creditors**

Phil F. Snow, Jr. Snow Fogel Spence LLP 2929 Allen Parkway, Suite 4100 Houston, TX 77019

Counsel for Baker Hughes Oilfield Operations, Inc. and Schlumberger Technology Corporation

Joel Hughes Thomas 408 W. Market St. Sinton, TX 78387

Counsel for La Copa Field Services, Inc.

# **Creditors and Parties Requesting Notice**

Scott T. Citek Lamm & Smith, P.C. 3730 Kirby Drive, suite 650 Houston, TX 77098

Counsel for Roywell Services, Inc.

Eric M. English King & Spalding, LLP 1100 Louisiana, Suite 4000 Houston, TX 77002

Counsel for Valerus Compression Services, LP

W. Lee Keeling Walker Keeling & Carroll LLP P.O. Box 108 Victoria, TX 77902-0108

Counsel for NBC Oilfield Equipment Inc.

1656284v2 3

Diane W. Sanders Linebarger Goggan Blair & Sampson, LLP The Terrace II 2700 Via Fortuna Dr., Suite 400 P.O. Box 17428 Austin, TX 78760-7428

# Counsel for Kennedy County, Kleburg County & Nucces County

Richard R. Stedman, II Sessions, Fishman, Nathan & Israel, L.L.P. 3850 N. Causeway Blvd., Suite 200 Metairie, LA 70002-7227

Counsel for H.B. Rentals, LC, Warrior Energy Services Corporation and Stabil Drill Specialties, L.L.C.

Kevin M. Maraist Anderson Lehrman Barre & Maraist, LLP Gaslight Square 1001 Third Street, Suite 1 Corpus Christi, TX 78404 Counsel for Exterran Energy Solutions, LP

Gerald C. DeLaunay Perrin, Landry, deLaunay, Dartez & Ouellet 225 La Rue France Lafayette, LA 70508 Counsel for Timco Services Inc.

Joel H. Thomas Molly P. Thomas 408 West Market Street P.O. Box 37 Stinton, TX 78387

Counsel for T Hunt Inc. d/b/a T&T Construction and J.M. Davidson, Inc.

Henry J. Kaim King & Spalding LLP 1100 Louisiana, Suite 4000 Houston, TX 77002

Counsel for Seashore Investment Management Trust

Jeffrey J. Cotner John S. Black Gibbs & Bruns LLP 1100 Louisiana, Suite 5300 Houston, TX 77002

**Counsel for Seashore Investment Management Trust** 

Ronald A. Simank Schauer & Simank, P.C. 615 North Upper Broadway, Suite 2000-MSC 159 Corpus Christi, TX 78477 Counsel for Texas Energy Services LP and Forbes Energy Services LLC

Steven P. Vangel Sara M. Banks Hill Rivkins & Hayden LLP 712 Main Street, Suite 1515 Houston, TX 77002

#### Counsel for SCOMI Oiltools, Inc.

John Ely Ewing & Jones PLLC 6363 Woodway, Suite 1000 Houston, TX 77057 Counsel for Mustang Gas Compression LLC

Carl Dore, Jr.
Dore & Associates, Attorneys, P.C.
17171 Park Row, Suite 350
Houston, TX 77084
Counsel for Smith International, Inc.

1656284v2 4